

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

In re: ) Case No: 24-40877  
Gloria Lynn Broyles )  
 ) Chapter 13  
Debtor. )

**DEBTOR'S MOTION TO EMPLOY SPECIAL COUNSEL**

COMES NOW Debtor, by and through Debtor's undersigned Counsel, and states to the Court as follows:

1. Debtor filed this Chapter 13 Bankruptcy case in good faith on 03/15/2024.
2. The Court has jurisdiction in regard to this matter pursuant to 28 U.S.C. §151, §1334, and Local Rule 9.01(B) of the United States District Court for the Eastern District of Missouri. This is a core proceeding pursuant to 28 U.S.C. §157(b)(2). Venue is proper pursuant to U.S.C. §1409.
3. Debtor Gloria Lynn Broyles had a personal Injury claim arising from the Slip and Fall accident on 4/19/16 at Walmart.
4. Debtor hired OTT Law Firm, LLC to handle the Personal Injury Claim. On July 11, 2024 following a 4 day trial by jury, verdict was entered in the amount of \$900,000.00 in favor of Gloria Broyles. That amount was reduced 50% due to a finding a comparative fault. Joseph Ott, an attorney with OTT Law Firm, LLC will handle Debtor's claim.
5. Debtor moves the court to allow them to employ Joseph Ott as a special counsel for Personal Injury Claim.
6. Joseph Ott is an attorney at law duly admitted to practice in the state of Missouri.
7. Debtor will pay Ott Law firm 40% of the total amount recovered. If the client terminates Ott Law Firm representation, Ott Law Firm will claim a lien for the costs and time spent at their normal hourly rate of \$300.00 and \$75.00 for the paralegal. Agreed contract is attached as Exhibit A.
8. Joseph Ott has no connection with any creditor or interested party herein, the United States Trustee or any employee of the United States Trustee, and represents no interest adverse to the estate or to the Debtor.

9. Joseph Ott does not hold or represent any interest adverse to the debtor's estate and is a disinterested person within the meaning of 11 USC Sect. 101(14).

WHEREFORE, Debtor prays this honorable Court to employ Joseph Ott as a Special Counsel for Debtor's Personal Injury Claim.

Respectfully submitted,  
**A&L, LICKER LAW FIRM**

By: /s/ Tobias Licker  
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**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the **Foregoing Document** was filed electronically on July 20, 2024 with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

I certify that a true and correct copy of the **Foregoing Document** was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully pre-paid, addressed to those parties listed on the Court's Manual Notice List and listed below on July 20, 2024.

/s/ Saloni Mehta

**Diana S. Daugherty**                   **Via CM/ECF**  
Chapter 13 Trustee  
P.O. Box 430908  
St. Louis, MO 63143

**Office of the US Trustee**                   **Via CM/ECF**  
111 S Tenth St, Ste. 6.353  
St. Louis, MO 63102-1127

**Joseph Ott**  
Ott Law firm, LLC  
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